



principal place of business in California before it was dissolved.

4.

Defendant Kuldip R. Mehta was a citizen and resident of the State of California when Plaintiff filed the Complaint.

5.

Plaintiff claims she was injured and sustained pain and suffering, cost of treatment, and all other elements of damages under Georgia law. Complaint para. 38. She seeks damages for personal injuries, past, present, and future pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, economic losses, incidental expenses, past, present, and future medical expenses, lost earnings, loss of earning capacity, permanent injuries, punitive damages, and consequential damages to be proven at trial. Complaint para. 41. Counsel for Plaintiff stipulates the amount in controversy exceeds \$75,000.00 exclusive of interest and costs.

6.

This civil action is properly removable to this Court pursuant to 28 U.S.C. §§ 1332(a), 1441(a), 1446(a) and 1446 (b) because there is a complete diversity of citizenship between the Plaintiff and the Defendants and the amount in controversy, exclusive of interest and cost, exceeds the sum of \$75,000.

7.

All properly served Defendants consent to the removal of this case.

8.

Defendants give notice to the Court, the Clerk and parties under 28 U.S.C. § 1446 and Rule 11 Fed. R. Civ. P. they removed the case to this Court within thirty days after service and receipt of a copy of the Complaint filed in the Troup County State Court, Georgia, from which it may be ascertained that the case is one which is and/or has become removable.

DENNIS, CORRY, SMITH & DIXON, LLP

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**CERTIFICATE OF SERVICE**

I electronically filed NOTICE OF REMOVAL with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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I also mailed by United States Postal Service the document to the following non-CM/ECF participants: None.

This 19th day of December, 2019.

/s/ *Grant B. Smith*  
GRANT B. SMITH, ESQ.  
For the Firm

2697-13948(GBS)